



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

ALC

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 1, 2015

By E-mail, Hand Delivery and ECF

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New York, NY 10036-8704

Re: United States v. Elson Warren  
Criminal Docket No. 04-354 (S-3) (NG)

Dear Counsel:

Enclosed are the government's disclosures pursuant to 18 U.S.C. § 3500 and Rule 26.2 of the Federal Rules of Criminal Procedure ("3500 material") in connection with the suppression hearing in the above-referenced case. Specifically enclosed is 3500 material for the following witnesses:

1. New York City Police Department ("NYPD") Detective Daniel Aybar
2. NYPD Detective Sean Cyrus
3. NYPD Sergeant Luke Denesopolis
4. NYPD Detective Eugene Jonny
5. NYPD Detective Chad Mack
6. NYPD Detective Yuriy Manzurov
7. NYPD Detective John Siokas
8. An NYPD undercover officer referred to as "UC 1"
9. An NYPD undercover officer referred to as "UC 2"

Of the foregoing law enforcement witnesses, the government currently expects to call as witnesses at the suppression hearing Detective Aybar, Sergeant Denesopolis, Detective Jonny, Detective Siokas, UC 1 and UC 2. The government also currently expects to call a civilian witness associated with the McDonald's restaurant relevant to the hearing.

The government will provide you with additional disclosures of 3500 material should it become aware of any such additional material.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

KELLY T. CURRIE  
Acting United States Attorney

By: /s/  
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cc: Clerk of the Court (NG) (by ECF and Hand Delivery)